

**MICHAEL D. BIRNBAUM**  
**Attorney for Plaintiff**  
**SECURITIES AND EXCHANGE COMMISSION**  
**New York Regional Office**  
**3 World Financial Center – RM 400**  
**New York, NY 10281-1022**  
**Ph: (212) 336-0523**  
**Fx: (212) 336-1319**  
**birnbaumm@sec.gov**

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

-----X  
SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

-against-

CLEAN CARE TECHNOLOGIES, INC.,  
EDWARD KLEIN, AL NAZON and  
ANIL VARUGHESE,

Defendants,

and

CLEAN CARE SYSTEMS, LLC,

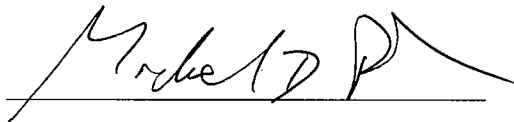
Relief Defendant.

08 Civ. 1719 (HB)  
ECF CASE

-----X  
**PLAINTIFF SECURITIES AND EXCHANGE COMMISSION'S REQUEST TO ENTER**  
**DEFAULT AGAINST DEFENDANT CLEAN CARE TECHNOLOGIES, INC.**

Plaintiff Securities and Exchange Commission hereby respectfully requests that the Clerk of Court enter judgment against Defendant Clean Care Technologies, Inc. pursuant to Federal Rule of Civil Procedure 55(a) and Local Civil Rule 55.1. In support of its Request, the Commission submits, as required by this Court's Electronic Case Filing Rule 16.1, an unsigned Clerk's Certificate (Attachment A). In further support of its Request, the Commission also submits the attached Declaration of Michael D. Birnbaum in Support of Clerk's Certificate Noting Default of Defendant Clean Care Technologies, Inc. (Attachment B).

Dated: June 5, 2008  
New York, New York

A handwritten signature in black ink, appearing to read "Michael D. Birnbaum", written over a horizontal line.

MICHAEL D. BIRNBAUM  
Attorney for Plaintiff  
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## **Attachment A**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**-against-**

**CLEAN CARE TECHNOLOGIES, INC.,  
EDWARD KLEIN, AL NAZON and  
ANIL VARUGHESE,**

**Defendants,**

**and**

**CLEAN CARE SYSTEMS, LLC,**

**Relief Defendant.**  
-----X

**08 Civ. 1719 (HB)  
ECF CASE**

**CLERK'S CERTIFICATE NOTING DEFAULT OF DEFENDANT  
CLEAN CARE TECHNOLOGIES, INC.**

I hereby certify that the docket entries and record in the above-captioned civil action show the following:

1. On February 21, 2008, Plaintiff Securities and Exchange Commission ("Commission") commenced this action with the filing of a Complaint and the issuance of summonses.
2. Service of the summons and complaint was affected upon defendant Clean Care Technologies, Inc. ("CCT"), through its counsel on February 21, 2008, and proof of such service thereof was filed with the Court on June 3, 2008.
3. Pursuant to Federal Rules of Civil Procedure 6 and 12, CCT's Answer was due no later than March 12, 2008.

4. On March 24, 2008, the Honorable Judge Harold Baer extended the Defendants' time to file an answer or otherwise respond to the Commission's Complaint until April 11, 2008.
5. As of the date of this Certificate, Defendant CCT has not filed an answer or other responsive pleading, or otherwise defended this action, as provided by the Federal Rules of Civil Procedure and the Local Civil Rules, and its time to answer or otherwise respond to the Complaint has expired.

The default of Clean Care Technologies, Inc. is hereby noted.

Dated:

June \_\_, 2008  
New York, New York

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CLERK, UNITED STATES DISTRICT COURT

## **Attachment B**

**MICHAEL D. BIRNBAUM**  
**Attorney for Plaintiff**  
**SECURITIES AND EXCHANGE COMMISSION**  
**New York Regional Office**  
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**New York, NY 10281-1022**  
**Ph: (212) 336-0523**  
**Fx: (212) 336-1317**  
**birnbaumm@sec.gov**

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

-----X  
**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**-against-**

**CLEAN CARE TECHNOLOGIES, INC.,**  
**EDWARD KLEIN, AL NAZON and**  
**ANIL VARUGHESE,**

**Defendants,**

**and**

**CLEAN CARE SYSTEMS, LLC,**

**Relief Defendant.**  
-----X

**08 Civ. 1719 (HB)**  
**ECF CASE**

**DECLARATION OF MICHAEL D. BIRNBAUM IN SUPPORT OF**  
**CLERK'S CERTIFICATE NOTING DEFAULT**  
**OF DEFENDANT CLEAN CARE TECHNOLOGIES**

I, MICHAEL D. BIRNBAUM, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am employed as an attorney in the New York Regional Office of plaintiff Securities and Exchange Commission (the "Commission"). I submit this Declaration in support of the Commission's application, pursuant to Fed. R. Civ. P. 55(a) and Local Rule 55.1, for a certificate of Default against Defendant Clean Care Technologies ("CCT").

2. I am familiar with the facts and proceedings in this action and the allegations in the Commission's complaint (the "Complaint"). I make this declaration upon information and belief, the sources of which are documents obtained by the Commission and conversations with other members of the Commission's staff. The documents that I reviewed include the docket maintained by the Court in this matter, Court Orders, and documents obtained by the Commission staff during the course of the investigation preceding the institution of this action.

3. Upon information and belief, CCT is a corporation, and is not an infant, in the military, or an incompetent person.

4. The Commission filed its Complaint in this matter on February 21, 2008.

5. On February 21, 2008, the Commission properly served the summons and complaint on Clean Care Technologies, Inc. by Federal Express to its counsel, upon consent by its counsel.

Proof of such service was filed with the Court on June 3, 2008.

6. Pursuant to Federal Rules of Civil Procedure 6 and 12, CCT's Answer was due no later than March 12, 2008.

7. On March 24, 2008, the Honorable Judge Harold Baer extended the Defendants' time to file an answer or otherwise respond to the Commission's Complaint until April 11, 2008.

8. CCT has failed to appear through counsel in connection with this litigation.

9. CCT has failed to plead or otherwise defend the action as provided for by the Federal Rules of Civil Procedure and the Local Civil Rules.

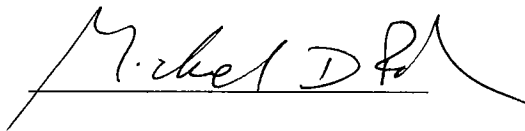
10. CCT is in default.



Accordingly, a Certificate of Default should be issued by the Clerk of this Court and a judgment by default should be entered against CCT.

I state under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
June 5, 2008



Michael D. Birnbaum